UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL 2272
LITIGATION)	
)	Master Docket Case No. 1:11-cv-05468
This document relates to:)	
		Honorable Rebecca Pallmeyer

William Colbert, et al. v. Zimmer, Inc., et al., Northern District of Illinois, Case No. 1:12-cv-06169

STIPULATION RE: RESPONSIVE BRIEFING ON DEFENDANTS' SUGGESTION OF REMAND

Plaintiff's counsel requested an extended briefing schedule for Defendants' Suggestion of Remand (Doc. No. 577); Defendants agreed. The parties, therefore, stipulate to the entry of the following briefing schedule and protocol:

- 1. Plaintiffs' response will be filed on or before September 7, 2012.
- 2. Defendants' reply will be filed on or before September 14, 2012.
- 3. The parties consent to the Court's ruling on the parties' briefs.

Dated: August 21, 2012

POGUST BRASLOW & MILLROOD, LLC

/s/ Tobias L. Millrood
Tobias L. Millrood, Esq.
Eight Tower Bridge, Suite 1520
161 Washington Street
Conshohocken, PA 19428
Phone: (610) 941-4204

Phone: (610) 941-4204 Fax: (610) 941-4245

Email: tmillrood@pbmattorneys.com

Plaintiff's Counsel

/s/ Joseph H. Yeager, Jr.

Joseph H. Yeager, Jr., #2083-49 Andrea Roberts Pierson, #18435-49-A Faegre Baker Daniels LLP 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204

Telephone: (317) 237-0300 Facsimile: (317) 237-1000

Email: <u>jay.yeager@faegrebd.com</u> andrea.pierson@faegrebd.com

Linda S. Svitak
Faegre Baker Daniels LLP
2200 Wells Fargo Center
90 S. Seventh Street
Minneapolis, Minnesota 55402-3901

Telephone: (612) 766-8530 Facsimile: (612) 766-1600

Email: linda.svitak@FaegreBD.com

Attorneys for Defendants Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/ Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer

Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc.

CERTIFICATE OF SERVICE

I certify that on August 21, 2012, a copy of the foregoing *Stipulation Re:*Responsive Briefing On Defendants' Suggestion of Remand was filed electronically and it is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by the Electronic Filing System and via electronic mail.

Joseph H. Yeager, Jr., #2083-49 Andrea Roberts Pierson, #18435-49-A Faegre Baker Daniels LLP 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204

Telephone: (317) 237-0300 Facsimile: (317) 237-1000

Email: jay.yeager@faegrebd.com andrea.pierson@faegrebd.com Linda S. Svitak
Faegre Baker Daniels LLP
2200 Wells Fargo Center
90 S. Seventh Street
Minneapolis, Minnesota 55402-3901
Talankana (612) 766 8520

Telephone: (612) 766-8530 Facsimile: (612) 766-1600

Email: linda.svitak@FaegreBD.com

/s/ Tobias L. Millrood.